



25122 Regal Drive • P.O. Box 1447 • Abingdon, VA 24212-1447
(276) 628-7151
(276) 628-3594 fax
Bristol 669-7153
Smyth Co. 783-7159

Washington County Service Authority

www.wcsa-water.com

October 9, 2003

Nancy T. Norton, P.E.
Virginia Department of Environmental Quality
Southwest Regional Office
P. O. Box 1688
Abingdon, VA 24212

Dear Ms. Norton:

Thank you for providing us with a copy of the document entitled *TMDL for Cedar Creek, Hall/Byers Creek, and Hutton Creek*, drafted September 2003. We have reviewed this document and have the following comments:

1. We concur with your conclusion that current pollutant discharge limits and other permit requirements are being met by point sources.
2. We concur that there appears no need to change the permitted suspended solids limits for point source discharges to protect benthic organisms.

We appreciate the efforts being made by the Department of Environmental Quality in the protection of the watershed of our surface water treatment plant. This water plant produces potable water for many residents in Washington County as well as parts of Sullivan County Tennessee. Please advise us if we can be of assistance in any way.

Sincerely,

A handwritten signature in cursive script that reads "Doug Canody".

Doug Canody, P.E.
Washington County Service Authority

Cc: David S. Dawson, PhD, P.E.—General Manager, WCSA
Ed Mullins—Wastewater Manager, WCSA
Carrie Howell—Staff Scientist, WCSA

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OCT 14 2003

DEQ-SWRO



New River Highlands

RESOURCE CONSERVATION AND DEVELOPMENT AREA

100 USDA Drive, Suite F
Wytheville, Virginia 24382
www.newriverhighlandsrcd.org
Phone (276) 228-2879
Fax (276) 228-4367

To: Ms. Nancy Norton
DEQ
P.O. Box 1688
Abingdon, VA 24212

From: Gary Boring, RC&D Coordinator

Date: October 8, 2003

Re: Draft TMDL Report for Three Creeks

I reviewed the draft plan and I am concerned that streambank erosion was not listed as a source of sediment. There are significant sections on all four streams that are experiencing streambank erosion.

The draft plan does not identify this source and more significantly does not allocate any reduction of sediment from this source.

This will eliminate streambank stabilization from being considered in the development of an implementation plan. There is very little opportunity to secure funding for streambank stabilization through existing cost share programs. Streambank stabilization could be included in EPA 319 funding for TMDL implementation if it is identified as a sediment source and a reduction is identified in the TMDL plan.

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Street Address: 355 Deadmore Street, Abingdon, Virginia 24210
Mailing Address: P.O. Box 1688, Abingdon, Virginia 24212-1688
Fax: (276) 676-4899
www.deq.state.va.us

Robert G. Burnley
Director

Michael D. Overstreet
Regional Director
(276) 676-4800

November 21, 2003

Mr. Gary Boring, RC&D Coordinator
New River Highlands RC & D Area
100 USDA Drive, Suite F
Wytheville, Virginia 24382

Re: Three Creeks Draft Total Maximum Daily Load (TMDL) for Benthics


Dear Gary:

The purpose of this letter is to document our discussions regarding your comments of October 8, 2003 about the benthic TMDL draft report on Hutton, Hall/Byers and Cedar Creeks in Washington County, Virginia. You expressed concern that the draft report does not identify streambank erosion as a source of sedimentation and that there is no specific reduction allocation for this source. If streambank stabilization is not specifically spelled out in the TMDL document, you expressed doubt that funding sources would be available for this corrective action.

The draft TMDL mentions streambank erosion as a sediment source in multiple locations, in Chapter 3.2.3, 3.9, 4.1, 4.1.3, and 7.1. In Chapter 7.1 streambank stabilization is discussed as one of the ways to reduce sedimentation. Chapter 7.1 states BMPs that vegetate the riparian zone and stabilize streambanks will reduce sedimentation. The GWLF model accounts for streambank erosion in the "delivery ratio or factors" used in modeling each land use. Since the data resolution of the model did not include details about streambank erosion, breaking out streambank erosion as a separate line in the TMDL table and the reduction allocation table is not possible at this time.

I have discussed your comments with Clint Boschen at Tetratex, Inc. and he has indicated that he will revise the draft document to reflect our discussion. He intends to state the case for streambank stabilization to reduce sedimentation more plainly. The implementation plan should also address streambank stabilization as an important component of sedimentation reduction. With both documents available when funding is sought, the issue of funding should be resolved.

Thank you for participating in the draft report review on these watersheds. Your input is valuable and will allow us to develop a document that will be more useful to restore the aquatic communities in these streams.

Sincerely,

Nancy T. Norton, P. E.
SWRO-TMDL Coordinator